

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

Rena Andoh (admitted *pro hac vice*)
randoh@sheppardmullin.com.com

30 Rockefeller Plaza
New York, NY 10112
Telephone: (212) 653-8700
Facsimile: (212) 653-8701

Lai L. Yip (SBN 258029)
lyip@sheppardmullin.com

Four Embarcadero Center, 17th Floor
San Francisco, CA 94111
Telephone: (415) 434-9100
Facsimile: (415) 434-3947

Travis J. Anderson (SBN 265540)
tanderson@sheppardmullin.com
12275 El Camino Real, Suite 100
San Diego, CA 92130
Telephone: (858) 720-8900
Facsimile: (858) 509-3691

Kazim A. Naqvi (SBN 300438)
knaqvi@sheppardmullin.com
1901 Avenue of the Stars, Suite 1600
Los Angeles, CA 90067
Telephone: (310) 228-3700
Facsimile: (310) 228-3701

*Attorney for Plaintiff and Counter-Defendant
Moog Inc.*

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MOOG INC.,

Case No. 2:22-cv-09094-GW-MAR

Plaintiff,

V

SKYRYSE, INC. ROBERT ALIN
PILKINGTON, MISOOK KIM, and
DOES NOS. 1-50.

Defendants

**PLAINTIFF MOOG INC.'S
APPLICATION FOR LEAVE TO
FILE UNDER SEAL DESIGNATED
MATERIALS FROM ITS NOTICE
OF LODGING OF SLIDES
PRESENTED AT JUNE 7, 2023
HEARING**

1 SKYRYSE, INC.,
2 Counterclaimant,
3 vs.
4 MOOG INC.,
5 Counter-Defendant.

Judge: Hon. George H. Wu
Magistrate Judge: Hon. Margo A.
Rocconi

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1 **TO THE ABOVE CAPTIONED COURT, AND TO ALL PARTIES**
2 **AND THEIR ATTORNEYS OF RECORD:**

3 Pursuant to Local Rule 79-5 *et seq.*, Plaintiff and Counter-Defendant Moog
4 Inc. (“Moog”) hereby submits this application for an order permitting it to file under
5 seal portions of its Notice of Lodging of Slides Presented at June 7, 2023 Hearing on
6 Skyryse’s Motion to Enforce Order Compelling Trade Secret Identification (the
7 “Designated Materials”).

8 Moog submits that compelling reasons exist to permit the Designated
9 Materials to be filed under seal. The Designated Materials include portions of
10 documents that have been identified as Protected Material pursuant to the Protective
11 Order entered in this action on May 6, 2022 (the “Protective Order”) (Dkt. 89).
12 Specifically, the Designated Materials contain pictures and excerpts from Moog’s
13 Trade Secret Identification, served on February 21, 2023 and designated as
14 “HIGHLY CONFIDENTIAL—OUTSIDE COUNSEL & EXPERTS’ EYES
15 ONLY” under the Protective Order. The material that Moog requests to file under
16 seal is the type of information that Moog does not make public, does not share with
17 competitors, and keeps confidential in its business. If disclosed publicly, it could be
18 used by Moog’s competitors to secure unfair competitive advantage and cause
19 irreparable business harm.

20 Specifically, Moog seeks to file the following Designated Materials under
21 seal: highlighted portions of slides 4, 6, and 7 from the slide presentation attached as
22 Exhibit A to the Notice of Lodging of Slides Presented at June 7, 2023 Hearing on
23 Skyryse’s Motion to Enforce Order Compelling Trade Secret Identification.

24 This application is further based upon the accompanying Declaration of
25 Kazim Naqvi in Support of this Application; any pleadings, files, and records in this
26 action; and any further evidence or argument as this Court may consider.

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1 Dated: June 12, 2023

2 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

3 By

4 */s/ Kazim Naqvi*
5 Kazim Naqvi

6 Attorney for Plaintiff and Counter-Defendant
7 MOOG INC.

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